

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA**

DIANA MEY,)
Individually and on)
behalf of a proposed class,)
)
Plaintiff,)
)
v.)
)
ALL ACCESS TELECOM, INC.;)
BANDWIDTH INC.;)
CENTURYLINK COMMUNICATIONS,)
LLC; LEVEL 3 COMMUNICATIONS,)
LLC; INTELIGENT, INC.; AFFINITY)
NETWORK INCORPORATED; and)
TELIAX, INC.;)
)
Defendants.)

Case No.: 5:19-CV-00237-JPB

**JOINT STIPULATION EXTENDING TIME FOR
DEFENDANT BANDWIDTH INC. TO FILE A MOTION TO COMPEL REGARDING
PLAINTIFF'S DISCOVERY RESPONSES**

PLEASE TAKE NOTICE that Plaintiff and Defendant Bandwidth Inc. ("Bandwidth"), through their below counsel, hereby stipulate and agree to extend the time for Bandwidth to file a Motion to Compel regarding Plaintiff's responses to Bandwidth's first set of discovery requests.

1. Plaintiff served answers and responses to Bandwidth's First Set of Interrogatories and Requests for the Production of Documents on December 20, 2021.
2. Under Local Rule 37.02(b), Bandwidth has 30 days after service of the discovery responses to file a Motion to Compel regarding Plaintiff's discovery responses.
3. Counsel for Plaintiff and Bandwidth plan to meet and confer regarding Plaintiff's responses to Bandwidth's first set of discovery requests.

4. The parties stipulate and agree that Bandwidth shall have until February 4, 2022, to file a Motion to Compel regarding Plaintiff's responses to Bandwidth's first set of discovery requests. The parties further stipulate that Plaintiff will have until February 18, 2022 to file an opposition in response to a Motion to Compel filed by Bandwidth.

Dated: January 13, 2022

Respectfully submitted by,

<p><u>/s/ John W. Barrett</u> John W. Barrett (WV Bar No. 7289) Jonathan R. Marshall (WV Bar No. 10580) Benjamin J. Hogan (WV Bar No. 12997) BAILEY & GLASSER LLP 209 Capitol Street Charleston, WV 25301 Telephone: 304-345-6555 Facsimile: 304-342-1110 JBarrett@baileyglasser.com JMarshall@baileyglasser.com BHogan@baileyglasser.com</p> <p>William Howard (admitted <i>pro hac vice</i>) THE CONSUMER PROTECTION FIRM 401 East Jackson Street, Suite 2340 SunTrust Financial Center Tampa, FL 33602 Telephone: 813-500-1500 Facsimile: 813-435-2369 Billy@TheConsumerProtectionFirm.com</p> <p>Yvette Golan (admitted <i>pro hac vice</i>) THE GOLAN FIRM 2000 M Street NW, Suite 750-A Washington, DC 20036 Telephone: 866-298-4150 ext. 101 Facsimile: 928-441-8250 YGolan@tgfirm.com</p> <p><i>Counsel for Plaintiff</i></p>	<p><u>/s/ Danielle Waltz</u> Danielle Waltz (WVSB #10271) Laura Hoffman (WVSB #12748) JACKSON KELLY PLLC 500 Lee Street East, Suite 1600 Charleston, WV 25301 Telephone: (304) 340-1000 Facsimile: (304) 340-1130 dwaltz@jacksonkelly.com laura.hoffman@jacksonkelly.com</p> <p>Amy E. Richardson (admitted <i>pro hac vice</i>) HARRIS WILTSHIRE & GRANNIS LLP 1919 M Street, NW 8th Floor Washington, DC 20036 Telephone: (202) 730-1329 Facsimile: (202) 730-1301 arichardson@hwglaw.com</p> <p><i>Counsel for Defendant Bandwidth Inc.</i></p>
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